

Comments filed with respect to RM-11305
Petition For Spectrum Deregulation in the Amateur Service

To whom it may concern,

While I generally support the goals proposed in RM-11305 (removal of mode-based sub-bands in the Amateur service), I believe some modifications to the proposal would be in order to provide some protection from interference, intended or otherwise, to existing operators. Note: these comments apply only the so-called "HF" bands from 1800kHz to 29700kHz.

Rather than completely eliminate all mode-based sub-bands, the following sub-band compromise is suggested:

A: The lowest 50kHz of the 80, 40, 20, 15, and 10 meter Amateur bands, and the lowest 25kHz of the 17 and 12 meter bands shall be specifically allocated for low bandwidth Data, CW and RTTY only (these modes only, as currently defined in FCC part 97).

B: Automatic and Semi-Automatic transmissions shall be permitted in the following sub-bands (Note: all other modes are also permitted in these sub-bands):

160 Meters:	1820-1850 kHz
80 Meters:	3550-3700 kHz
40 Meters:	7050-7150 kHz
20 Meters:	14050-14150 kHz
17 Meters:	None
15 Meters:	21050-21200 kHz
12 Meters:	None
10 Meters:	28050-28500 kHz

Suggestion: Perhaps a higher license class (maybe Extra Class?) should be required for automatic and semi-automatic transmissions.

C: FCC Rules, 97.307 f (2) shall apply for all non-phone emissions.

This should be sufficient to allow new modes to be freely deployed, and offer sufficient guidelines for operational and technical standards with respect to interference to other stations using currently existing modes.

Comments on the Amateur Service in general:

I have been an Amateur licensee since 1972, and have been actively engaged in experimentation and innovation involving radio since then. The Amateur Radio service provides a practical, legal medium for deployment of these experiments and experimental transmitters, and for real-world use of the equipment. For me personally, Amateur Radio was the training ground for a life long career in electronics and engineering. I have personally mentored numerous people in the pursuit of knowledge on radio, electronics and engineering in general, and Amateur Radio has been the facilitating element.

In addition to providing a public service with respect to emergency and other related communications, Amateur Radio provides the only freely available, long term medium for radio learning and experimentation with practical deployment and direct communication with others, many of whom share these technical interests, or are motivated to delve into the more technical aspects after “listening in” to related conversations.

This unique opportunity for learning, innovation and experimentation with radio and electronics is unmatched by any other medium, and provides a significant benefit to the public, industry and the Nation as a whole.

Respectfully Submitted,

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